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Honorable Robert W. Lehrburger United States Magistrate Judge 500 Pearl Street New York, NY 10007 Telephone: (347) 687-2019 cmulhollandesq@gmail.com

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Re: Rosario Sanchez v. El Club Valle Restaurant Corp., 20-cv-10584 (JMF)

Your Honor,

Plaintiff writes this Court respectfully requesting leave to file a default motion on or before June 30th, 2021.

The undersigned had been in on-going discussions by phone with an agent for the Defendants and the parties moved frustratingly close to a final number. If we told you how close, the Court would schedule a settlement conference immediately to turn the final screws.

Sadly, the Defendants went radio silent and last mentioned hiring an attorney before declining to negotiate further. I would respectfully request until June 30th, 2021 to make a default motion. I will try to message the Defendants in the meantime to see if we can bridge the gap including sending over a certificate of default.

If they do not respond or appear, then I would advise my client that we have to follow through with a default motion to be submitted on June 30th, 2021 or such other date this Court deems just and proper.

SO ORDERED:

5/12/2021

HON, ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE /s/Colin Mulholland, Esq.
Colin Mulholland, Esq.
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Telephone: (347) 687-2019 *Attorney for Plaintiff*